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9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
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12 In Re 17 U.S.C. § 512(h) Subpoena to
13 CLOUDFLARE, INC.

Case Number: 2:22-mc-00242

**DECLARATION OF JAN VAN
VOORN IN SUPPORT OF
ISSUANCE OF SUBPOENA
PURSUANT TO 17 U.S.C. § 512(h)**

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20 I, Jan van Voorn, the undersigned, declare that:

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22 1. I am Executive Vice President and Chief of Global Content Protection
23 for the Motion Picture Association, Inc. (“MPA”). I submit this declaration on
24 behalf of Columbia Pictures Industries, Inc., Paramount Pictures Corp., and Warner
25 Bros. Entertainment, Inc. (“ACE Members”), each of which is a member of the
26 Alliance for Creativity and Entertainment (“ACE”). ACE is a global coalition of
27 leading content creators and on-demand entertainment services committed to
28 supporting the legal marketplace for video content and addressing the challenge of

1 online piracy. The ACE Members, whether themselves or through subsidiaries and
2 affiliates, own the copyrights in the below referenced copyrighted works.

3 2. The ACE Members (via the Motion Picture Association, Inc.) are
4 requesting issuance of the attached proposed subpoena that would order Cloudflare,
5 Inc. to disclose the identities, including names, physical addresses, IP addresses,
6 telephone numbers, e-mail addresses, payment information, account updates and
7 account histories of the users operating the following websites:

No	Domain	M3u Portal	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
1	iptvdark.com	line.dar ktv- pro.m e:80	Aquaman	103.176. 90.154:8 080/live/ plav/T0d wcE5rV mlMM3 BhUkhk dldYTXJ OR0Yv U0VWa WEwWn FUVEp3 UlhseFd GWXdN WEpHV m5sclR XZGhR VDA9/1 50522	Like a Boss	103.176.90.161:8080/l ive/plav/TkZBMFIVE G9aa2R6UTNkVU5E aG9OR2RGWmtoS1 NUazRWbFo1V1hsU WNlhbBMMDh2Vmt kS1JuazJXVDA9/168 982
2	iptvfinland.me	worldi ptv.me :8080	Men In Black II	85.203.1 7.41:808 0/live/pl av/WiFo UlbURld TM05M VFRkc1 YzUm9i RIJvY21 0UE1rM XNNakl 3Y0RC MmRXe EISbWx DV0VaT 2IwMT VORDA 9/87213	Top Gun	85.203.17.54:8080/liv e/plav/VEhCWllvWll NMDlhUzFFeVYzZH FRVzVaTmxBclJTcz VNVW8xY25OSWO zUiRXWE5zVkhKbG FFeDVkejA9/118949

1 3. The purpose for which this subpoena is sought is to obtain the identities
2 of the individuals assigned to these websites who have exploited ACE Members'
3 exclusive rights in their copyrighted motion pictures without their authorization.
4 This information will only be used for the purposes of protecting the rights granted
5 to ACE Members, the motion picture copyright owners, under Title II of the Digital
6 Millennium Copyright Act.

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8 I declare under penalty of perjury under the laws of the United States of
9 America that the foregoing is true and correct to the best of my knowledge,
10 information or belief.

11 Executed at Redondo Beach, California, on December 9, 2022.

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Jan van Voorn